



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

February 19, 2021

Via ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

Plaintiff Securities and Exchange Commission (“Commission”) writes to apprise the Court that Defendant continues to violate the Court’s Order (“Jan 19 Order”) by failing to produce documents and a *full* accounting. As background, the Jan 19 Order required Defendant to “produce all financial records and other documents requested by the SEC-including records and documents for Dawn Bronson and V2IP-no later than two weeks from entry of this Order, along with a full accounting of all assets and income.” DE 223. The Commission filed its document request and the subpoenas on ECF. DE 229-1, 229-2, 229-3.

Rather than comply with his legal obligations to the Commission and this Court, Defendant continues to play games and insist that the Commission provide a list of documents he should produce. This assertion completely reverses a party’s obligation in discovery because the existence and types of responsive documents pertaining to his financial condition are matters directly within the Defendant’s knowledge and control. It is Defendant’s obligation to provide responsive documents or state that no such documents exist. Indeed, Defendant only now acknowledges that thousands of V2IP documents have not been reviewed for responsiveness. As to the Court ordered accounting of assets and income, Defendant merely provided an unsupported statement of financial condition to the Commission.

Commission counsel believes Defendant’s conduct is sanctionable. As a direct result of Defendant’s failure to provide complete and accurate information, Commission counsel seeks the Court’s permission to extend the deposition deadlines until Defendant produces, and the Commission reviews, responsive documents.

Respectfully submitted,
s/*Maureen Peyton King*